

**DISCOVERY MATTER**

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Attorneys for Plaintiff  
KENO V. THOMAS

**UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA**

KENO V. THOMAS,

Plaintiff,

v.

STARZ ENTERTAINMENT, LLC;  
MICHAEL THORNTON; and DOES 1  
through 10, inclusive,

Defendants.

Case No.: CV15-09239 CAS (AFMx)

[Assigned to the Honorable Christina A.  
Snyder – Courtroom 8D]

**NOTICE OF MOTION RE JOINT  
DISCOVERY STIPULATION  
COMPELLING PRODUCTION OF  
DOCUMENTS OR, IN THE  
ALTERNATIVE, FOR PROTECTIVE  
ORDER**

Date: April 4, 2017  
Time: 10:00 a.m.  
Crtrm: H

**MATTER FOR DETERMINATION BY  
THE HONORABLE ALEXANDER F.  
MACKINNON**

Complaint filed: October 29, 2015  
Discovery Cut-Off: August 29, 2017  
Motion Cut-Off: November 10, 2017  
Trial Date: March 6, 2018

1           **PLEASE TAKE NOTICE** that on April 4, 2017, at 10:00 a.m., or as soon  
 2 thereafter as counsel may be heard in Courtroom H, 9th floor of the United States  
 3 District Court, Central District, located at 312 North Spring Street, Los Angeles,  
 4 California 90012, Plaintiff Keno V. Thomas, will and hereby does move this Court for  
 5 an order compelling production of documents or, in the alternative, use of a protective  
 6 order appropriate to this case.

7           This motion is made following efforts by Plaintiffs' counsel to resolve these  
 8 issues informally, as required by Local Rule 37-1, *et seq.* See Declaration of Brian  
 9 Olney ("Olney Decl."), ¶¶ 2-13, filed concurrently herewith.

10          This motion is and will be based upon this Notice of Motion; the Joint Stipulation  
 11 of Counsel, and exhibits; the pleadings and records on file with this court; the  
 12 Declaration of Brian Olney; any evidence of which the Court may take judicial notice  
 13 prior to or at the hearing of this matter; and upon such oral or documentary evidence as  
 14 may be presented at the hearing of this motion.

15  
 16 Dated: March 13, 2017

Respectfully Submitted,

17 ROBERT D. NEWMAN, ATTORNEY AT LAW  
 18 HADSELL STORMER & RENICK LLP

19  
 20 By: /s/ - Brian Olney

Dan Stormer

Cindy Pánuco

Brian Olney

Attorneys for Plaintiff